

Hon. Brian M. Cogan  
 United States District Court  
 Eastern District of New York  
 225 Cadman Plaza East  
 Brooklyn, NY 11201

February 28, 2024

**Re: *North American Soccer League, LLC v. United States Soccer Federation, Inc. and Major League Soccer, L.L.C.*, No. 1:17-cv-05495**

Dear Judge Cogan:

The parties to the above-referenced case are pleased to report that they have reached agreement upon a proposed pretrial schedule. Pursuant to the Court's order of February 21, 2024, the parties hereby jointly propose the schedule set forth below. To the extent that the decisions on the pending summary judgment and *Daubert* motions impact the issues that need to be tried and what needs to be disclosed pretrial, the parties will meet and confer and determine whether they can agree on any modifications to the proposed schedule or propose modifications to the Court.

<b>Proposed Date</b>	<b>Event</b>
6/27/24	Parties exchange initial witness lists, affirmative deposition designations and exhibit lists (excluding demonstratives). NASL highlights its deposition designations in blue, and Defendants in yellow.
6/27/24	NASL sends Defendants draft Joint Pretrial Order based on Judge Cogan's template, with placeholders for information to be provided by Defendants.
7/8/24	Parties to exchange initial lists of planned motions in limine.
7/8/24 - 7/18/24	Parties to meet and confer regarding motions in limine.
7/19/24	Deadline for motions in limine.
7/25/24	Parties exchange deposition counter-designations, objections to deposition designations, and objections to witness lists. Overlapping deposition designations are highlighted in green. NASL highlights counter-designations in red. Defendants highlight counter-designations in orange.
7/25/24	Parties exchange objections to exhibit lists, and exchange any rebuttal exhibit lists.

7/25/24	Defendants send NASL revised draft Joint Pretrial Order with placeholders filled and any requested edits to joint sections.
8/8/24	Parties exchange responses to objections to exhibit lists, and objections to rebuttal exhibit lists.
8/8/24	Parties exchange objections to deposition counter-designations and responses to objections to affirmative deposition designations.
8/9/24	Deadline for oppositions to motions in limine.
8/15/24	Parties exchange responses to objections to rebuttal exhibits.
8/15/24	Parties exchange responses to objections to deposition counter-designations.
7/18/24 to 8/21/24	The parties confer and exchange revised drafts of the Joint Pretrial Order to the extent necessary and attempt to resolve objections and other disagreements. The parties combine this into one document, including exhibit lists (excluding demonstratives), current witness lists (including any updates since prior exchanges), and any remaining objections and responses thereto. Deposition designations are compiled separately for physical submission during pretrial conference per Court's rules.
8/21/24	Last day for meet and confer sessions on exhibit lists, deposition designations.
8/21/24	NASL files the proposed Joint Pretrial Order.
8/21/24	Parties exchange proposed jury instructions and verdict sheet.
8/21/24 to 8/28/24	Parties attempt to negotiate joint proposed jury instructions to the extent possible. Parties combine their jury instructions into one document, with joint instructions where possible and otherwise each side's proposed instructions.
8/29/24	NASL files the combined jury instructions.
TBD	Pretrial conference
	Voir dire procedure TBD by Court (submission of proposed questions, etc.).
9/9/24	Complete set of documentary exhibits, list of all exhibits, and copy of witness lists due to courtroom deputy in duplicate.
9/9/24	Trial

Respectfully submitted,

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